

**REMARKS/ARGUMENTS**

In response to the Office Action dated January 27, 2005, please consider the following remarks.

In the Office Action issued January 27, 2005, claims 8-10 were rejected under 35 U.S.C. §112, ¶2 as being indefinite. Claims 8-10 were rejected under 35 U.S.C. §101 as being inoperable and lacking patentable utility. Claims 1-7, 11 and 12 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,493,708 to Ziauddin et al. (Ziauddin).

Claims 1-27 are now pending in this application. Claims 8-10 were amended as required by the Examiner to overcome the rejections under 35 U.S.C. §112, ¶2 and 35 U.S.C. §101. In particular, claims 8-10 were amended to clarify that the SQL statements that are constructed do not directly perform the recited functions, but rather that the SQL statements that are constructed are executable to perform the recited functions. Further, the amendments to claims 8-10 clarify that the bodies of the claims are consistent with the preambles of the claims.

The applicant respectfully submits that the present invention according to claims 1-7, 11, and 12 is not anticipated by Ziauddin. Ziauddin discloses techniques which allow function-defined hierarchies to be registered with a database server. Ziauddin discloses using an SQL statement to generate a materialized view of data in a database. By contrast, the present invention, for example, according to claim 1, requires receiving user input identifying, at least, one or more tables in the database that contain the

hierarchical data and the hierarchical structure of the hierarchical data and generating a Structured Query Language (SQL) statement using the user input. Ziauddin does not disclose or suggest the required step of generating an SQL statement using the user input. In Ziauddin, the only user input received is the complete SQL statement, so Ziauddin has no use for generating any SQL statements from the received user input.

Therefore, the present invention, according to claim 1, and according to claims 2-7, 11, and 12, which depend therefrom, is not is not anticipated by Ziauddin.

Each of the claims now pending in this application is believed to be in condition for allowance. Accordingly, favorable reconsideration of this case and early issuance of the Notice of Allowance are respectfully requested.

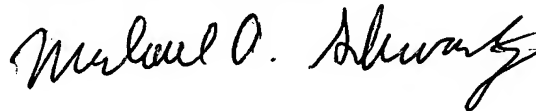
**Additional Fees:**

The Commissioner is hereby authorized to charge any insufficient fees or credit any overpayment associated with this application to Deposit Account No. 19-5127 (19111.0125).

**Conclusion**

In view of the foregoing, all of the Examiner's rejections to the claims are believed to be overcome. The Applicants respectfully request reconsideration and issuance of a Notice of Allowance for all the claims remaining in the application. Should the Examiner feel further communication would facilitate prosecution, he is urged to call the undersigned at the phone number provided below.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael A. Schwartz", written in a cursive style.

Michael A. Schwartz  
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Dated: April 8, 2005

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